

**SEALED**

**BY THE ORDER OF THE COURT**

KENJI M. PRICE #10523  
United States Attorney  
District of Hawaii

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII  
**Dec 06, 2019**  
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UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	MAG. NO. 19-01256 WRP
	)	
Plaintiff,	)	CRIMINAL COMPLAINT;
	)	AFFIDAVIT IN SUPPORT OF
vs.	)	CRIMINAL COMPLAINT
	)	
TYLER PANG,	)	
	)	
Defendant.	)	
	)	

**CRIMINAL COMPLAINT**

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief.

Count One  
Distribution of Child Pornography  
(18 U.S.C. § 2252A(a)(2))

On or about October 16, 2018, within the District of Hawaii, TYLER PANG, the defendant, did knowingly distribute any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(2).


Count Two  
Cyberstalking  
(18 U.S.C. § 2261A(2))

On or about and between April 1, 2018, and January 28, 2019, both dates being approximate and inclusive, within the District of Hawaii, TYLER PANG, the defendant, with the intent to harass, intimidate, and cause substantial emotional distress to another person, specifically, Adult Female 1 (“AF1”), did use facilities of interstate and foreign commerce, including the internet and other forms of electronic communication services, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to AF1.

All in violation of Title 18, United States Code, Section 2261A(2).


I further state that I am a Special Agent with the Federal Bureau of Investigation (“FBI”), and that this Complaint is based upon the facts set forth in the attached “Special Agent’s Affidavit in Support of a Criminal Complaint,” which is incorporated herein by reference.

DATED: December 6, 2019, Honolulu, Hawaii.

  
\_\_\_\_\_  
JOHN G. MIKEL  
Complainant

Sworn to under oath before me telephonically, and attestation acknowledged pursuant to Federal Rule of Criminal Procedure 4.1(b)(2).



  
\_\_\_\_\_  
Wes Reber Porter  
United States Magistrate Judge

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	MAG. NO. 19-01256 WRP
	)	
Plaintiff,	)	AFFIDAVIT IN SUPPORT OF
	)	CRIMINAL COMPLAINT
vs.	)	
	)	
TYLER PANG,	)	
	)	
Defendant.	)	
_____	)	

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**INTRODUCTION**

1. This affidavit is submitted for the purpose of establishing probable cause that TYLER PANG (“PANG”), the defendant, committed the following two offenses within the District of Hawaii: (a) knowingly distributing child pornography on or about October 16, 2018, in violation of 18 U.S.C. § 2252A(a)(2); and (b) engaging in conduct constituting cyberstalking of a female victim (“AF1”), from on or about and between April 1, 2018, and January 28, 2019, in violation of 18 U.S.C. § 2261A(2). As detailed below, PANG’s cyberstalking of AF1 occurred over a course of time, and involved PANG’s possession of a sexually explicit video of AF1 that was created when she was still a

minor, age seventeen. In the course of investigating this conduct, law enforcement confirmed that AF1 informed PANG she was still a minor when the sexually explicit video was created. Despite knowing AF1's age in the sexually explicit video, PANG distributed it to another person, as detailed below in paragraph 19.

2. I am a Special Agent ("SA") with Federal Bureau of Investigation ("FBI"), and am presently assigned to the Violent Crimes Against Children section. I have been a Special Agent for approximately ten years. I have received training from the FBI, United States Department of Justice Training Center, Office of Juvenile Justice and Delinquent Prevention, and Fox Valley Technical College. During the course of my work as a Special Agent, I have investigated and received training for cases involving child sex crimes and child pornography.

3. I am familiar with the facts set forth in this affidavit based upon my personal knowledge and information provided to me by other law enforcement personnel and/or witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the criminal complaint charging PANG with violations of federal law. Accordingly, this affidavit does not set forth all of the facts known to me or to law enforcement regarding this matter. Summaries of and statements from conversations do not include references to all topics covered in the

communications. This affidavit is not intended to include each and every fact and matter observed or known to the government.

**PROBABLE CAUSE**

4. On April 8, 2018, an adult female (“AF1”) living on the island of Oahu, Hawaii, filed a complaint with the Honolulu Police Department (“HPD”). At the time, AF1 was seventeen (17) years old. AF1 stated that in December 2017, she and her ex-boyfriend had consensual sexual intercourse and recorded a video of the encounter using her cell phone, while AF1 was still a minor. The video contained sexually explicit depictions of AF1’s breasts and genitals during the intercourse.

5. According to the HPD report, AF1 explained that on April 1, 2018, she began to receive messages sent to her Instagram account from a user she did not recognize (“the user”). Instagram is a free-access social networking website that can be utilized on its website or special electronic application (phone application), and uses the internet. As such, the use of Instagram constitutes the use of a means of interstate and foreign commerce. The user told AF1 that he would “spread and post” a sexually explicit video of AF1 if she did not do certain things he demanded. AF1 reported that the user sent her a portion of the explicit video, and screenshots from the video, so she knew the user did have a copy of the sexually explicit video in his possession. AF1 confirmed that the screenshot the user sent her showed AF1’s face, breasts, and/or genitals.

6. AF1 stated that in the week after the user contacted her, she received threatening messages each day that this user would release the video, from approximately six different Instagram usernames, each with a unique combination of male names and numbers. She provided these usernames to law enforcement. AF1 suspected the user had gained access to the sexually explicit video on her cellphone through her cloud storage, or some other security breach.

7. AF1 further reported that one of her friends contacted her on April 4, 2018, and said he had received a message on Instagram containing a video of her having sexual intercourse, from someone with the username “@Zjesse18000.” This username was the same as one of the accounts from which AF1 had received threatening messages.

8. On September 24, 2018, AF1 submitted a complaint to the FBI, reiterating the facts set forth above. In this complaint, AF1 stated that shortly before filing the complaint with the FBI, two of her friends had been sent copies of the sexually explicit video she had made with her ex-boyfriend. AF1 reported that she did not know who the user was that was sending this video to her friends. She stated that the user continued to contact her frequently with more threats about distributing the video.

9. AF1 stated that the reason she was filing a complaint with FBI was that she wanted to prevent the video from being sent to any more people, such as her

friends, and she wanted to find out the identity of the user, *i.e.*, the person sending her threatening messages. She also stated her fear that if the video were further disseminated around the internet or to people she knew, it might affect her reputation, and her ability to get a job in the future. AF1 stated that the sexually explicit video qualified as child pornography, because she was only seventeen years old at the time it was created.

10. On approximately September 28, 2018, I spoke with AF1, and she confirmed that the unknown Instagram user was using more than one Instagram account to send her messages and threats. These included the same user who had distributed the video to one of her friends. The messages from the user typically demanded that AF1 send nude photos of herself, or the user would continue to release the sexually explicit video. The messages also included demands that AF1 meet up with the user in person for sex. On one occasion, the user attempted to set up a meeting with AF1 in person at a dormitory at a university in Hawaii. AF1 reported that she told the user she was only seventeen years old in the sexually explicit video, and that the user could go to jail “for child pornography.” AF1 told the user she would contact the police, but the user continued to send threats.

11. On October 15, 2018, AF1 provided law enforcement with screenshots (*i.e.*, still-photos from her phone) of conversations she had with the user on Instagram who was sending her threatening messages. AF1 further stated that she



had broken up with her ex-boyfriend in March 2018, and that during their relationship, her boyfriend had the passwords to AF1's social media accounts.<sup>1</sup>

12. According to the screenshots provided by AF1, the first account that made contact with her in April 2018 was "zjesse18000." The messages from "zjesse18000" include the following:

zjesse18000: Watching you get fucked was the hottest thing ever [embedded video clip of AF1 engaged in sexually explicit conduct].

zjesse18000: Should i spread it more or will you do as i say

AF1: I can have you arrested for child pornography. You will go to jail and be a convicted felon.

AF1: How did you get that video.

zjesse18000: I'll tell you later ok

AF1: No you will tell me now

zjesse18000: You will wary

zjesse18000: Wait

AF1: Wait for what??

AF1: Tell me now or I'm pressing charges on you and you'll be a registered sex offender

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<sup>1</sup> AF1 further stated that she believed the camera roll on her phone, which would have included the sexually explicit video when she possessed it, "backs up" to her Snapchat "memories," a feature on another social media platform. AF1 believed this may explain how the sexually explicit video got out of her possession.

zjesse18000: You can't threaten me

zjesse18000: Do u really want it to be spread around

13. Another set of screenshots provided to me by AF1 contains a conversation with username "kyle89843." During this conversation, the user tells AF1 to send him explicit photos of her breasts, and AF1 attempts to arrange a meeting in person so that she can determine who the user is:

kyle89843: I want to see it thru pics first

kyle89843: So that's a no?

AF1: Why do you need to see it

kyle89843: I just want to see it once

kyle89843: All im asking is of your boobs no face

AF1: Dude do you not understand that I'm a minor

kyle89843: So youre not going too ?

AF1: No I'm not, can you just meet up with me?

kyle89843: Send one without face and i will meet and show you everything

kyle89843: Did you want to see the other videos?

AF1: Yes I want to see the other videos

kyle89843: Okay send of your boobs after then

kyle89843: If not im really not going to meet and show you

14. During the months that followed, FBI conducted an investigation into the identity of the user on Instagram that had been repeatedly contacting AF1 with

threats. The investigation revealed a specific address in the District of Hawaii that was associated with PANG.

15. On January 28, 2019, I received a phone call from AF1, who was now attending college on the mainland. She told me she was being contacted by a new user on Instagram, with username “moneywaster509001,” who was asking her for nude photographs. The user again threatened to send the sexually explicit video of her to people at the college AF1 now attended on the mainland. The user told her he obtained the video from “the boyfriend.” AF1 was concerned that the user, who now knew what college she attended, would distribute the videos to individuals at her college.

#### **Interview of Tyler PANG**

16. On February 6, 2019, FBI agents arranged for an in-person meeting with PANG. The meeting took place at a Starbuck’s, and PANG was informed that the meeting was voluntary. PANG confirmed his phone number, and certain other personal details relevant to the investigation. At first, PANG denied knowing AF1, but later admitted he did know someone by her name, and had “DM’d” her (*i.e.*, “direct-messaged her”) on Instagram regarding her ex-boyfriend. PANG also mentioned a sex tape of AF1 that he had seen online on a website called Discord. He stated he found the video online and recorded a copy of it on his cellphone. He claimed he had since deleted that video. PANG stated that he knew AF1 was a

minor in the video, based on messages he had exchanged with AF1.

17. During this interview, I presented PANG with information from the FBI's investigation into the usernames that harassed AF1. At first, PANG denied knowing these usernames, but after being shown additional digital information, he confirmed that he had used the usernames on Instagram. PANG then admitted to reaching out to AF1 via Instagram messaging and requesting sexual favors or pictures in exchange for not sharing the sexually explicit video with her friends. PANG admitted to sending (*i.e.*, distributing) the sexually explicit video of AF1 to one of her friends. He stated the video did not show AF1's face. PANG stated that he believed he sent these messages in approximately October 2018. PANG confirmed his use of the accounts "jesse18008," "ranger80006," and, most recently in January 2019, "moneywaster509001." He stated that he was "over that stuff now." PANG was instructed to stop contacting AF1.

#### **Further Investigation**

18. During the course of further investigation, FBI obtained further evidence, including content from the Instagram usernames utilized by PANG to harass AF1. This content included the messages AF1 provided to law enforcement as screenshots. This content corroborates AF1's reports to law enforcement.

19. Further evidence obtained by law enforcement reveals that on approximately October 16, 2018, PANG used Instagram—*i.e.*, a means of interstate

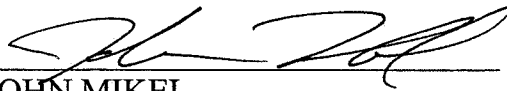
and foreign commerce, as set forth above in paragraph 5—to contact another Instagram user and discuss the “trade” of sexually explicit images and videos. PANG then sent (*i.e.*, distributed) the sexually explicit video of AF1 to this other user, and included AF1’s real first name and the name of the high school she had attended. PANG and the other user then discussed the names of other girls in certain high schools, in an effort to “trade” sexually explicit material in their possession.

20. AF1 reported to law enforcement that the experience of this harassment and stalking on Instagram caused her severe and substantial emotional stress, especially while the threats were ongoing. She reported that if she would block one user on Instagram, he would just change usernames and contact her again. She experienced sleep loss, anxiety attacks, and extreme stress. This experience had a very negative impact on her life. She fears that the dissemination of the video may have impacted her reputation and her ability to seek employment in the future.

**CONCLUSION**


Based on the foregoing, I believe there is probable cause to arrest TYLER PANG for the violations of federal law set forth above.

Respectfully submitted,

  
JOHN MIKEL  
Special Agent  
Federal Bureau of Investigation

Sworn to under oath before me telephonically, and attestation acknowledged pursuant to Federal Rule of Criminal Procedure 4.1(b)(2). Based upon the foregoing, the undersigned Judicial Officer finds that there is probable cause to believe that defendant above-named committed the crimes charged in the Criminal Complaint this 6th day of December, 2019.



  
Wes Reber Porter  
United States Magistrate Judge